

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ERIK J. CARDIN,

Plaintiff,

v.

LEAH M. OLSZEWSKI,

Defendant.

Civil Action No. 1:19cv01646 (LO/JFA)

**DEFENDANT/COUNTERCLAIM PLAINTIFF'S
PROPOSED VOIR DIRE QUESTIONS**

1. Do you know any of the following attorneys in this case?
 - a. James Kurz, Redmon, Peyton & Braswell LLP
 - b. Christine Walz, Holland & Knight LLP
 - c. Katherine Skeele, Holland & Knight LLP
 - d. Kevin D'Olivo, Holland & Knight LLP
 - e. Robert Farlow, Holland & Knight LLP
 - f. Jennifer Becker, Legal Momentum
2. Do you know any of the following parties in this case?
 - a. Erik Cardin
 - b. Leah Olszewski
3. Do you know any of the following individuals who may be witnesses in this case?
 - a. Luke Holway
 - b. Thomas Carter
 - c. Dr. Renette Dallas
 - d. Jennifer Archambeault
 - e. Don Christiansen
 - f. Terry Boyd
 - g. Jerry Turcott
 - h. Dr. James Hopper
 - i. Officer Jerry Brown
4. Have any of you ever served on a jury?
 - a. What kind of case?
 - b. Did you deliberate?
 - c. Without revealing the verdict, did you reach a verdict?

5. Have you ever been active duty, reserve or a civilian employee of the US Air Force, the US Army, or the US Army National Guard?
6. Have any of your family members or close friends ever been active duty, reserves, or a civilian employee of the US Air Force, US Army or US Army National Guard?
7. Have any of you, your family members, or close friends been impacted by domestic violence?
8. Have any of you, your family members, or close friends, ever been involved as a party or witness in a lawsuit that involved domestic violence or malicious prosecution?
9. Have you ever been accused of domestic violence?
10. Have you ever been charged with a crime (not to include traffic violations)?
11. Have you ever been incarcerated in jail or prison?
12. Have you ever been charged with a criminal offense involving allegations of domestic/intimate partner violence or sexual assault?
13. Have you ever been a party to a civil protective order or restraining order proceeding?
14. Does anyone believe that domestic violence only comes in the form of physical violence?
15. Does anyone believe that domestic violence does not include emotional, verbal and psychological abuse?
16. Do you believe there are valid reasons why someone may choose not to report crimes to the police?
17. Is anyone incapable of believing a domestic violence victim because they did not immediately seek help or report to the police?
18. Do you believe that victims of domestic violence should have access to the justice system for protection and accountability?
19. Do you believe that domestic violence in the U.S. Military is not a problem?
20. Do you believe that plaintiffs should not be able to recover money for emotional distress they have experienced?
21. Is there anything about the nature of this case that leads you to believe that you could not be a fair and impartial juror for both sides in this case?
22. We expect this case to take approximately 4 days to complete. Does anyone have a personal commitment that would make sitting on this jury a hardship? Does anyone have

any personal reasons that would prevent them from giving this case their full time and attention?